

CGB-CC-0339

Received & Inspected

JAN 13 2012

FCC Mail Room



January 6, 2012

Office of Secretary  
Federal Communications Commission  
Attention: Disability Rights Office, Room 3-B431  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: Petition for Exemption from Closed Captioning Requirement

Gentlemen:

The Ocala First United Methodist Church records its Sunday Morning service and then rebroadcasts it to a small local area. The primary purpose of the broadcast is for the benefit of the shut-in or ill members of our congregation. A handful of faithful volunteers do the camera work, tape and post production of the video. We have no paid staff members assisting in the work due to lack of available funds. Our only expense is the monthly fee charged by the TV station to broadcast our program.

With the current economic conditions our church has already had to cut back on many of its ministries. On January 1<sup>st</sup> of 2010 we cut our program down from one hour to thirty minutes in order reduce our costs to the point we could keep the program on the air. If we are not granted a waiver from closed captioning we would have to hire an outside firm to do the work for us. The best price we have been able to locate is \$7,150 per year (See Attachment #1). In addition to this out of pocket costs, additional time would be required of our volunteers. Time they do not have. Our church policy does not allow for the use of corporate sponsorship of the program. We did request help with the cost from the local TV station and were rejected (See Attachment #2). Without this waiver our church cannot afford to continue providing this service to our elderly congregation (See Attachment #3).

We therefore request that you grant Ocala First United Methodist Church an exemption from Closed Captioning for its "Sunday Morning Service" program.

Respectfully Submitted

A handwritten signature in black ink, appearing to read "Tim M. Gude".

Tim M. Gude  
Chairman of TV Committee  
Ocala First United Methodist Church

**From:** Jenny Carson [mailto:jcarson@uscaptioning.com]  
**Sent:** Tuesday, November 22, 2011 11:46 AM  
**To:** Tim Gude  
**Subject:** RE: U.S. Captioning Company

Hello Tim

Thanks for getting back to me so quickly. I checked into Fox 51, and due to their current captioning contract, I am only able to provide you with post production as an option. However, we do provide multiple options for payment if you were to utilize our services, including debit/credit card payments.

With 3 day turnaround, roll-up mode (what you usually see for closed captioning) for a 30 minute program would be \$137.50. That is the final cost, no hidden fees. Also, since the process is digital, you won't be dependant on getting the project in the mail. Also, we will do a test with you to ensure compatibility between our softwares. That process involves an upload of your content, about a minute of it, and we would provide you with a captioning file to insert.

If anyone else at the church has questions, please feel free to share my contact information with them. Have a great Thanksgiving!

Sincerely,

**Jenny M. Carson**  
Captioning Sales Director  
U.S. Captioning Company, Inc.  
Country World Productions, Inc.  
Phone: (920) 338-9201  
Fax: (920) 338-9202

**WOGX-FOX 51**  
Gainesville/Ocala, FL.

Thursday, December 1, 2011

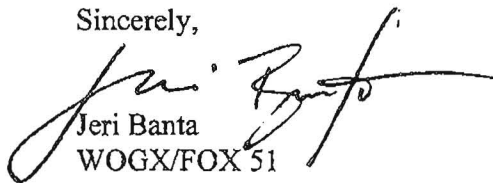


Tim Gude  
Chairman of TV Committee  
Ocala First United Methodist Church  
40 SE 11<sup>th</sup> Ave.  
Ocala, FL. 34471

Dear Tim,

In regards to your request for financial assistance, our station does not subsidize program production costs incurred by parties who purchase air time. Consequently we must respectfully decline your request.

Sincerely,

  
Jeri Banta  
WOGX/FOX 51

December 22, 2011

Mr. Tim Gude  
Chair  
FUMC TV Committee

Re: Closed Captioning – First United Methodist Church Ocala, Florida

Dear Mr. Gude:

We have received your request for the church to pay for closed captioning for our weekly broadcast. You've explained that closed captioning has been required by the FCC – even for a not for profit organization that is purchasing TV time.

As you are aware, Ocala Florida has been severely impacted by the recession. In 2008, the Ocala MSA had the 4<sup>th</sup> highest increase in unemployment in the nation. This has impacted church operations. The last 3 years, our church has run operating deficits as follows:

2008 \$98,886.00  
2009 \$100,101;  
2010 \$102,094

Unfortunately, these large deficits have depleted the church's operating reserves. We are working to preserve our existing ministries, but we can no longer carry a deficit budget. The television is a priority ministry for the church and we have committed to funding it as its present level. However, the church is not financially capable of absorbing the expected \$7,000 cost of providing closed captioning.

Sincerely,



Mark A. Imes  
Finance Chair  
First United Methodist Church  
Ocala, Florida